

June 15, 2018

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Support for the comments in the Ex Parte Notice filed by SECA on May 23, 2018 regarding invoice deadline extensions for E-Rate funding that experiences post commitment changes.

CC Docket No. 02-6 WC Docket No. 13-184

Dear Ms. Dortch,

On May 23, 2018 the State E-Rate Coordinators Alliance (SECA) filed an Ex Parte notice of a meeting between SECA and FCC staff where issues surrounding the invoice deadline in the E-Rate program were discussed. AdTec, Inc supports SECA's proposal that the invoice deadlines for any FRN that receives a Revised Funding Commitment be set to 120 days from the approval of the revised commitment or the service deliver deadline set by the revised commitment, whichever is later. We also support the recommendation that this modification apply to all FRNs currently under review by USAC or the FCC as well as those presented in the future. We believe that this modification is in keeping with the third goal of the first E-Rate Modernization Order (FCC 14-99, July 23, 2014) "Making the E-rate Application Process and Other E-rate Processes Fast, Simple and Efficient".

We applaud the progress the FCC and USAC has made in "Making the E-rate Application Process and Other E-rate Processes Fast, Simple and Efficient," but believe there is substantial work yet to be done by both organizations to meet the performance targets established by the FCC (FCC 14-99, July 23, 2014, para.57-62). We thank you for your ongoing efforts to listen to program participants and making adjustments as needed.

Respectfully Submitted,

Charles F. Hobbs, President

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